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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SOCORRO CHAVEZ, individually, and JUAN  
CHAVEZ, individually,

Plaintiffs,

v.

WYNDHAM VACATION RESORTS, INC.;  
WYNDHAM RESORT DEVELOPMENT CORP.;  
WYNDHAM WORLDWIDE OPERATIONS, INC.;  
WYNDHAM VACATION OWNERSHIP, INC.;  
JOSEPH YOUNG, an individual; and JOHN DOES  
1-50,

Defendants.

CASE NO.: 2:20-cv-1222-JCM-DJA

(State Case No. A-20-815334-C)

**STIPULATION AND  
ORDER TO EXTEND RESPONSE  
DEADLINES TO DEFENDANTS'  
MOTIONS TO DISMISS**  
*(First Request)*

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs Socorro Chavez and Juan Chavez (“Plaintiffs”), by and through their counsel of record, and Defendants Wyndham Vacation Resorts, Inc., Wyndham Resort Development Corporation, Wyndham Worldwide Operations, Inc., Wyndham Vacation Ownership, Inc., (collectively, “Wyndham Defendants”), and Joseph Young (“Young, and with the Wyndham Defendants, “Defendants”), by and through their counsel of record, hereby stipulate and agree, subject to the Court’s approval, that the time for Plaintiffs to file Responses to Defendants’ Motions to Dismiss, filed on June 29, 2020, shall be extended as set forth below, and in support thereof state as follows.<sup>1</sup> This is the first request to extend these deadlines.

1. Defendants filed a Demand for Non-Resident Cost Bond from Plaintiffs on June 29, 2020;

<sup>1</sup> Concurrent with filing the Motions to Dismiss, Defendants also filed a Demand for Non-resident Cost Bond to Plaintiffs. Under NRS 18.130, this case is stayed until Plaintiffs post an undertaking or money with the court sufficient to secure costs that may be awarded against them. Based on representations that the cost bond will be posted, Defendants are in agreement to extend Plaintiffs’ response deadline as follows.

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2. Wyndham Defendants jointly filed a Motion to Dismiss on June 29, 2020;
3. Defendant Joseph Young filed a Motion to Dismiss on June 29, 2020;
4. Plaintiffs' Responses to each of Defendants' above-mentioned Motions to Dismiss are currently due on July 13, 2020;
5. Pursuant to Local Rule IA 6-1(b), the parties state the reason for the extension is that counsel requires more time to evaluate and respond to Defendants' above-mentioned Motions to Dismiss. Counsel for Plaintiff will also be unavailable for personal reasons during the second week of July 2020.
6. The parties agree that Plaintiffs shall have until on or before Monday, July 27, 2020, to file their Responses to Defendants' above-mentioned Motions to Dismiss;
7. Defendants agree to file their Replies to Defendants' above-mentioned Motions to Dismiss in conformity with the court rules.
8. This stipulation is made in good faith and is not sought for delay or any improper purpose.

WHEREFORE, the parties hereby stipulate and respectfully request that the Court enter an Order extending the time for Plaintiffs to file their Responses to Defendants' above-mentioned Motions to Dismiss to July 27, 2020.

DATED this 13<sup>th</sup> day of July, 2020.

**ALBRIGHT, STODDARD, WARNICK  
& ALBRIGHT**

/s/ Jorge L. Alvarez, Esq.

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 Attorneys for Plaintiffs

DATED this 13<sup>th</sup> day of July, 2020.

**ARMSTRONG TEASDALE LLP**

/s/ Michelle D. Alarie, Esq.

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 Attorneys for Defendants

**ORDER**

**IT IS SO ORDERED** July 17, 2020.

  
 UNITED STATES DISTRICT COURT JUDGE